

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

AT&T SERVICES, INC., AT&T MOBILITY,
LLC, and AT&T CORP.,

Defendants.

Case No. 2:23-cv-00397-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF PLAINTIFF
HEADWATER RESEARCH LLC'S MOTION TO STRIKE CERTAIN OPINIONS OF
AT&T REBUTTAL EXPERT NENAD MEDVIDOVIC AND MOTION
TO EXCLUDE OPINIONS OF AT&T EXPERT MARK CROVELLA
REGARDING ALLEGED NON-INFRINGEMENT ALTERNATIVES**

I, Kristopher Davis, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff Headwater Research LLC's Motion to Strike Certain Opinions of AT&T Rebuttal Expert Nenad Medvidovic and Motion to Exclude Opinions of AT&T Expert Mark Crovella Regarding Alleged Non-Infringing Alternatives. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of excerpts from the Rebuttal Expert Report of Nenad Medvidovic Regarding Non-Infringement of U.S. Patent Nos. 8,589,541 and 9,215,613, dated March 13, 2025.

3. Attached as Exhibit 2 is a true and correct copy of excerpts from Plaintiff Headwater Research LLC's First Set of Interrogatories to AT&T Services, Inc. AT&T Mobility, LLC, and AT&T Corp., dated January 19, 2024.

4. Attached as Exhibit 3 is a true and correct copy of AT&T's Fourth Supplemental Responses to Plaintiff Headwater Research LLC's First Set of Interrogatories, dated February 26, 2025.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from the deposition transcript of Jason Sikes, dated January 8, 2025.

6. Attached as Exhibit 5 is a true and correct copy of excerpts from the deposition transcript of David Storm, dated January 10, 2025.

7. Attached as Exhibit 6 is a true and correct copy of excerpts from Samsung's opening report on invalidity in *Headwater Research LLC v. Samsung Elecs. Co.*, No. 2:22-cv-00422-JRG-RSP, produced at HW397-00073773.

8. Attached as Exhibit 7 is a true and correct copy of excerpts from Samsung's non-infringement report in *Headwater Research LLC v. Samsung Elecs. Co.*, No. 2:22-cv-00422-JRG-RSP, produced at HW397-00083838.

9. Attached as Exhibit 8 is a true and correct copy of excerpts from the Expert Report of Mark E. Crovella Regarding Invalidity of U.S. Patent Nos. 8,589,541 and 9,215,613, dated January 29, 2025.

10. Attached as Exhibit 9 is a true and correct copy of excerpts from the Rebuttal Expert Report and Disclosure of Melissa A. Bennis, dated March 13, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 2, 2025, at Los Angeles, California.

/s/ Kristopher Davis
Kristopher Davis